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# STANDARD OPERATING PROCEDURES

The standard operating procedures in this section were developed to assist Fort Belvoir in complying with all Federal laws and regulations concerning cultural resources management. The three-ring binder format was adopted to permit substitution when procedures are revised by the originating agencies.

Users should note that Procedures 1-3 apply to compliance with Section 36 CFR 800, the ACHP regulations. Procedure #1 has been modified to reflect revisions made by the ACHP during the Spring of 1999. Appendix I of this ICRMP contains the full text of these revised Section 106 procedures and copies of current Department of the Army regulations (DA 200-4 and DA PAM 200-4). Additional information on how to reference the current texts of all other relevant cultural resources statutes and implementing regulations also is presented in Appendix I.

The following procedures should be incorporated into Fort Belvoir's current management framework:

- Procedure 1: Section 106 Compliance
- Procedure 2: Assessing Effects on Historic Properties
- Procedure 3: Public Participation During Section 106 Consultation Process
- Procedure 4: Archeological Resource Protection Act (ARPA) Compliance
- Procedure 5: National Environmental Policy Act (NEPA) Compliance
- Procedure 6: Native American Graves Protection and Repatriation Act (NAGPRA) Compliance
- Procedure 7: American Indian Religious Freedom Act (AIRFA) Compliance
- Procedure 8: Emergency Procedures for Unexpected Discoveries of Archeological Deposits
- Procedure 9: Curation of Archeological Collections
- Procedure 10: Emergency Procedures for Architectural Resources
- Procedure 11: Economic Analysis for Demolition of Historic Buildings

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# STANDARD OPERATING PROCEDURE 1:

## SECTION 106 COMPLIANCE

**Please Note: This SOP is based on 36 CFR 800 in effect as of 17 June 1999. The new regulations allow three options for undertaking Section 106 consultation. The following SOP is based on the standard regulation. The consultation process may also be integrated into other compliance processes, such as NEPA. In addition, the Army may develop alternative procedures for the Section 106 consultation process; draft counterpart regulations are under development by AEC, but not yet available.**

The Cultural Resources Manager (CRM) is designated as the POC for the Section 106 process undertaken at Fort Belvoir, including those projects proposed by tenant organizations that are subject to the Section 106 process. Section 106 of the National Historic Preservation Act of 1966, as amended, requires Federal agencies to consider the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (the Council) a reasonable opportunity to comment on such undertakings. The Section 106 process must be completed for undertakings that affect historic properties at Fort Belvoir *prior* to starting work. Initiating the Section 106 process in a project's early planning stages allows the fullest range of options to minimize or mitigate any adverse effects on historic properties.

An historic property is any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places (36 CFR 800.16(l)). Historic built resources currently identified at Fort Belvoir include the National Register-eligible Fort Belvoir Historic District, the U.S. Army Package Power Reactor (SM-1 Plant); and two individual properties, the Camp A. A. Humphreys Pump Station and Filter Building and the Thermo-Con House; the National Register eligible Woodlawn Friends Meeting House and Cemetery also is surrounded by, but is not part of, Fort Belvoir. Fort Belvoir also encompasses the National Register listed Belvoir Manor Ruins and Fairfax Gravesites archeological site, and 11 other archeological sites have been assessed as National Register eligible.

Fort Belvoir is responsible for initiating the Section 106 process. Consultation is undertaken among the Agency official (in this case, an official at Fort Belvoir with approval authority (36 CFR 800.2(a)), the State Historic Preservation Office (SHPO), and consulting parties (See SOP 3). Consulting parties include those individuals or organizations with an interest in the effects of the undertaking on the historic properties; Section 800.2(c) identifies those parties having a consultative role in the Section 106 process. The Council also may be a participant in the consultation process if the criteria defined in 36 CFR 800, Appendix A, are met. Under the new regulation, SHPOs have been assigned key roles in Section 106 consultation. Consultation for undertakings involving historic properties at Fort Belvoir will be conducted with the Virginia Department of Historic Resources (VDHR), which is the SHPO. This state agency maintains a full-time staff to assist agencies in consultation. The SHPO is required to respond to requests for project review within 30 days after receiving appropriate documentation.

The procedure set forth below defines how Fort Belvoir meets these statutory requirements based on the standard regulations. The Section 106 process consists of four primary steps (Figure 13):

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Step 1: Initiate Section 106 Process

Step 2: Identify Historic Properties

Step 3: Assess Adverse Effects

Step 4: Resolve Adverse Effects

## **Procedure**

### **Step 1: Initiate Section 106 Process**

1. *Establish undertaking.* The CRM will determine whether the proposed action or activity meets the definition of an “undertaking” (Section 800.16[y]) and, if so, whether it is a type of activity that has the potential to cause effects on historic properties. An undertaking is defined as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency (36 CFR 800.16(y)). DIS personnel, tenant organizations, and agents must consult with the CRM to determine whether a proposed action constitutes an undertaking. An undertaking will have an effect on a historic property when the action has the potential to result in changes to the character or use of the historic property within the area of potential effects. The area of potential effects is defined as "the geographic area(s) within which an undertaking may directly or indirectly cause changes in the historic character or use of historic properties, if any such properties exist" (36 CFR 800.16(a)).
  - 1(a). *No potential to cause effects.* If the undertaking does not have the potential to cause effects on historic properties, the CRM has no further obligations under Section 106 and the action may proceed. CRM should document decision for internal information (see Figure 14: Sample letter documenting “No Historic Properties” decision).
  - 1(b). *Potential to cause effects.* The undertaking is determined to have the potential to cause effects on historic properties. Go to 2.
2. *Coordinate with other reviews.* The CRM coordinates the Section 106 review, as appropriate, with the installation planning schedule and with any other required reviews (i.e., NEPA, NAGPRA). The CRM may use information from other review documents to meet Section 106 requirements.
3. *Identify the appropriate SHPO.* The CRM will determine the appropriate SHPO for consultation during the planning process. The CRM will identify other consulting parties (See SOP 3).
4. *Plan for public involvement.* In consultation with the SHPO, the CRM will plan for involving the public in the Section 106 process (See SOP 3).
5. *Identify other consulting parties.* In consultation with the SHPO, the CRM shall identify any other parties entitled to be consulting parties, including local government or applicants, and consider all written requests of individuals and organizations to determine which entities should be consulting parties (See SOP 3).

## The Revised Section 106 Process: Flow Chart

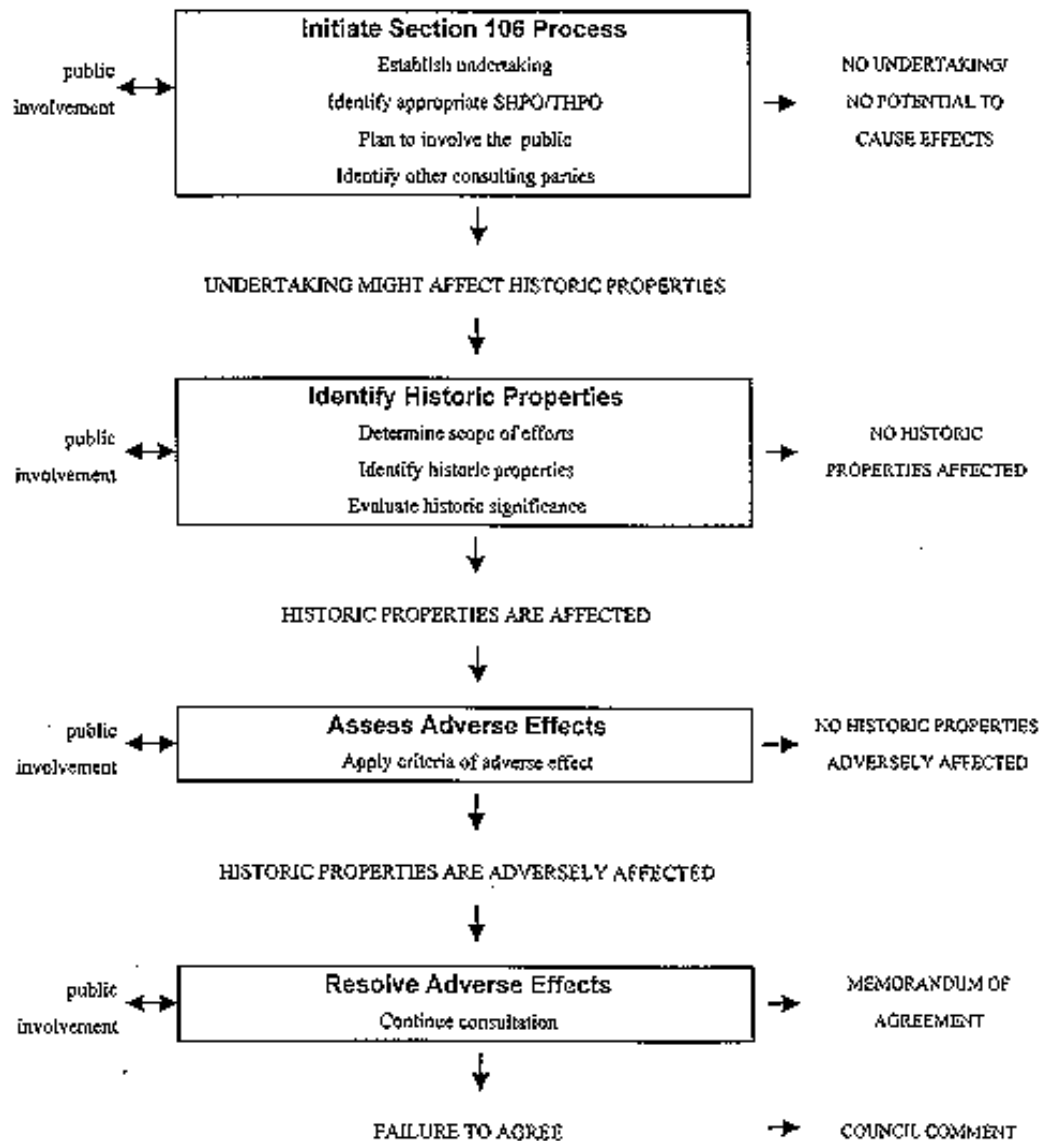


Figure 13. Schematic diagram of the Section 106 compliance process (revised June, 1999)

<i>Windows and Doors</i>				<b>INTERIOR CONDITIONS</b>			
• Are windows, doors, and frames rotted or corroded?							
• Have windows and doors been checked for condensation damage?							
• Are window panes intact?							
• Are screens intact and in place?							
• Do windows operate properly?							
• Is glazing putty intact?							
• Is caulking around window frames intact?							
• Are window/door sills angled properly to shed water?							
<b>Walls</b>							
• Have walls been checked for cracks?							
• Are walls free of water stains?							
<b>Ceilings</b>							
• Are ceilings free of water stains?							
• Have ceilings been checked for cracks?							
<b>Basement</b>							
• Has basement been inspected for insect infestation?							
• .... rodents?							
• .... water penetration?							
<b>Flooring</b>							
• Is flooring material intact?							
• Are floor joists intact (check basement)?							
• Has flooring been checked for water stains?							
<b>Ventilation</b>							
• Is the building properly ventilated?							
• Has building interior been checked for condensation?							

<i>Utilities</i>				
• Are smoke/fire detectors in working order?				
• Have heating and electrical systems been inspected?				
• Do heat or A/C filters need replacing?				

Director, State Historic Preservation Office  
Virginia Department of Historic Resources  
Commonwealth of Virginia  
2801 Kensington Avenue  
Richmond, VA 23221

Dear \_\_\_\_\_:

Fort Belvoir is planning the [name of project], [name of State]. We have found no historic properties existing within the project's area of potential effects (Section 800.4). The following documentation is attached for your review:

A description of the [name of project], including [specify maps, photographs, etc.];

A delineation of the area of potential effects; and

A summary description of the efforts we made to identify historic properties in the project's area of potential effects, including [specify survey report, etc.].

Please review the material enclosed and contact [name and telephone number of contact person] if you have any questions. If we do not hear from you within 30 days after your receipt of this letter, we will assume that you do not object to our determination, and will proceed with [the project/our planning process/our review of the application/etc.], subject to the provisions for treating historic properties discovered during implementation of an undertaking contained in 36 CFR Section 800.11.

Sincerely,

[name of agency official], USA  
Garrison Commander

Figure 14. Sample letter documenting "No Historic Properties" decision.

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## Step 2: Identify Historic Properties

6. *Determine scope of identification efforts and identify historic properties.* The CRM, in consultation with the SHPO, will determine and document the area of potential effects of the undertaking and review the existing historic property inventory (see Chapter II) to determine whether or not historic properties are located within the proposed area(s) of effect. The CRM may also seek information from consulting parties, as appropriate. Select option 6(a) or 6(b).
  - 6(a). *Historic properties affected.* The CRM determines that historic properties will be affected by undertaking and/or are located within the area of potential effects. Go to 7.
  - 6(b). *No historic properties affected.* The CRM determines that there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them. The CRM provides documentation of this finding, as set forth in 36 CFR 800.11(d), to the SHPO. The CRM also notifies all consulting parties of the decision and makes the documentation available to the public. A sample letter documenting such a "No Effect" decision is presented in Figure 15. Select option 6(b)1 or 6(b)2.
    - 6(b)1. If SHPO does not object within 30 days of receipt of an adequately documented finding, Fort Belvoir's responsibilities under Section 106 are fulfilled. The action may proceed.
    - 6(b)2. SHPO disagrees with Fort Belvoir's determination and the proposed undertaking is considered to have an "effect" on historic properties. Go to 7.

## Step 3: Assess Adverse Effects

7. *Apply criteria of adverse effect.* The CRM, in consultation with the SHPO and consulting parties, assesses the effect(s) of the proposed undertaking on historic properties following the criteria of adverse effect outlined in 36 CFR 800.5 and in DA PAM 200-4, Appendix C. Select option 7(a) or 7(b).
  - 7(a). *Finding of no adverse effect.* The CRM, in consultation with the SHPO, determines that the proposed undertaking does not meet the criteria of adverse effect (36 CFR 800.5(a)(1)) and, therefore, will have no adverse effect on historic properties. A finding of no adverse effect also may result if the undertaking is modified or conditions are imposed, such as subsequent review of plans for rehabilitation by SHPO, to ensure consistency with the *Secretary's Standards for the Treatment of Historic Properties* (36 CFR part 68), to avoid adverse effects.

The CRM documents the finding of no adverse effect following standards set forth in 36 CFR 800.11(e). The CRM notifies the SHPO and all consulting parties of the finding and provides them with the documentation. The SHPO must respond to the finding within 30 days. A sample letter documenting a



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“No Adverse Effect” finding is presented as Figure 16. Select option 7(a)1 or 7(a)2.

7(a)1. *Agreement with finding.* If the Council is not involved in the review process, the action may proceed if the SHPO agrees with the finding. Failure of the SHPO to respond within 30 days from receipt of documentation shall be considered agreement of the SHPO with the finding.

7(a)2. *Disagreement with finding.* If the SHPO or any consulting party disagrees with Fort Belvoir's determination within the 30-day review period, it responds in writing and specifies the reasons for disagreeing with the finding. The CRM can either consult with the party to resolve disagreement or request Council to review the decision. Go to 8.

7(b). *Finding of adverse effect.* If it is determined that the proposed undertaking will have an adverse effect on historic properties, the CRM will consult further to resolve the adverse effect. Go to 8.

#### Step 4: Resolve Adverse Effects

8. *Continue consultation.* The CRM continues consultation with the SHPO and consulting parties (see SOP 3) to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. The CRM submits documentation specified in 36 CFR 800.11(e) to the Council to notify them of the adverse effect finding. Fort Belvoir can request the Council to participate in the consultation or the Council can decide to enter consultation proceedings based on criteria in 36 CFR 800, Appendix A. The Council has 15 days to notify the CRM and consulting parties whether it will participate in adverse effect resolution.

In addition to the consulting parties identified under 36 CFR 800.3(f), other individuals and organizations can be invited to become consulting parties. The CRM makes information available to the public, including the documentation specified in 36 CFR 800.11(e), and provides an opportunity for comment about resolving the adverse effects of the proposed undertaking. Select option 8(a) or 8(b).

8(a) *Resolve adverse effect - resolution without Council.* Fort Belvoir, the SHPO, and consulting parties agree on how the adverse effects will be resolved and execute a Memorandum of Agreement (MOA)(see Figure 17). The CRM must submit a copy of the executed MOA, along with the documentation specified in 36 CFR 800.11(f), to the Council prior to approving the undertaking to meet the requirements of Section 106. Go to 9.

8(b) *Resolution with Council participation.* If consultations between Fort Belvoir and the SHPO fail to result in a MOA, Fort Belvoir will request Council participation and provide them with documentation specified in 36 CFR 800.11(g). If the Council joins the consultation, Fort Belvoir will proceed with consultations in accordance with 36 CFR 800.6(b)2 to reach an MOA.

[name of current Director]  
Director, State Historic Preservation Office  
Department of Historic Resources  
Commonwealth of Virginia  
2801 Kensington Avenue  
Richmond, VA 23221

Dear [name of current Director]:

Fort Belvoir is planning the [name of undertaking], [name of State]. We have applied the Criterion of Effect found in 36 CFR Section 800.8 of your regulations to this undertaking and determined that it will have no effect on historic properties. The following documentation is attached for your review:

A description of the [name of undertaking], including [specify maps, photographs, etc.];

A delineation of the area of potential effects;

A summary description of the efforts we made to identify historic properties in the undertaking's area of potential effects, including [specify survey report, etc.]; and

A description of how we applied the Criterion of Effect, and why we found it to be inapplicable to this undertaking.

Please review the material enclosed and contact [name and telephone number of contact person] if you have any questions. If we do not hear from you within 15 days after your receipt of this letter, we will assume that you do not object to our determination, and will proceed with [the undertaking/our planning process/our review of the application/etc.], subject to the provisions for treating historic properties discovered during implementation of an undertaking contained in 36 CFR Section 800.11.

Sincerely,

[name of agency official], U.S. Army  
Commander

Figure 15. Sample letter documenting "No Effect" decision

[Name of current Director]  
 Director, State Historic Preservation Office  
 Virginia Department of Historic Resources  
 Commonwealth of Virginia  
 2801 Kensington Avenue  
 Richmond, VA 23221

Dear \_\_\_\_\_:

Fort Belvoir is planning the [name of undertaking], [name of State]. In consultation with the Virginia State Historic Preservation Officer (SHPO), we have applied the Criteria of Effect and Adverse Effect found in 36 CFR Section 800.9 of your regulations to this undertaking and determined that it will have no adverse effect on historic properties. As indicated by [his/her signature below/the attached letter], the SHPO has concurred in our determination. The following summary documentation is attached for your review:

- A description of the [name of undertaking];
- A [map or other documentation] showing the area of potential effect;
- A summary description of the historic [property/properties] subject to effect;
- Our reasons for believing that the undertaking will have no adverse effect on historic properties;
- A copy of the SHPO's letter of [date] indicating concurrence in our determination [or have SHPO sign concurrence line on letter]; and
- [Copies/A summary] of the views of [specify interested persons who have submitted comments, if any]

[Use one or more of the following paragraphs only if relevant.]

Since our determination that this undertaking will have no adverse effect is based on the specific exception set forth in 36 CFR Section 800.9(c) [specify subsection (1), (2), or (3)], we are also enclosing [specify research design or scope of work for data recovery under subsection (1), plan for rehabilitation under subsection (2), or covenant or other restriction under subsection (3)].

In making our determination, we have agreed with the SHPO to carry out the following actions to ensure that adverse effect will be avoided:

[List actions agreed to.]

Please review the material enclosed and contact [name and telephone number of contact person] if you have any questions. If we do not hear from you within 30 days after your receipt of this letter, we will assume that you do not object to our determination, and will proceed with [the undertaking/our planning process/our review of the application/etc.], subject to [the agreement noted above and] the provisions for treating historic properties discovered during implementation of an undertaking contained in 36 CFR Section 800.11.

Sincerely,

[name of agency official], U.S. Army  
 Commander

Figure 16. Sample letter documenting "No Adverse Effect" decision

MEMORANDUM OF AGREEMENT	
<p>WHEREAS, the [name of agency] has determined that [name of undertaking] will have an effect upon [name of property or properties], (a property/properties) [included in/eligible for inclusion in] the National Register of Historic Places, and has consulted with the [name of State] State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f); (and Section 110(f) of the same Act (16 U.S.C. 470h-2(f)) and</p>	
<p>WHEREAS, [names of other consulting parties, if any] participated in the consultation [and has/have been invited to concur in this Memorandum of Agreement]; and</p>	
<p>WHEREAS, the definitions given in Appendix _____ are applicable throughout this Memorandum of Agreement.</p>	
<p>NOW, THEREFORE, [name of agency], the [name of State] SHPO, and the Council agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.</p>	
<p style="text-align: center;">Stipulations</p>	
<p>[Name of agency] will ensure that the following measures are carried out:</p>	
<p style="text-align: center;">[insert stipulations here.]</p>	
<p>Execution of this Memorandum of Agreement and implementation of its terms evidence that [name of agency] has afforded the Council an opportunity to comment on the [name of undertaking] and its effects on historic properties, and that [name of agency] has taken into account the effects of the undertaking on historic properties.</p>	
<p>ADVISORY COUNCIL ON HISTORIC PRESERVATION:</p>	
<p>By: _____ [Name and title of signer]</p>	<p>Date: _____</p>
<p>[NAME OF AGENCY]</p>	
<p>By: _____ [Name and title of signer]</p>	<p>Date: _____</p>
<p>[NAME OF STATE] STATE HISTORIC PRESERVATION OFFICER</p>	
<p>By: _____ [Name and title of signer]</p>	<p>Date: _____</p>
<p>[Note: Signature blocks listed above can be in any order.]</p>	
<p>Concur:</p>	
<p>[NAME(S) OF CONCURRING PARTY/PARTIES]</p>	
<p>By: _____ [Name and title of signer]</p>	<p>Date: _____</p>
<p>Optional: For use where other parties concur in MOA.</p>	

Figure 17. Sample Memorandum of Agreement

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If the Council decides not to join consultations, the Council will notify Fort Belvoir and proceed to comment. Go to 11.

9. ***Memorandum of Agreement.*** The Council receives the MOA for filing. Fort Belvoir has discharged its compliance responsibilities under Section 106. The proposed undertaking can proceed, according to any MOA stipulations.
10. ***Failure to resolve adverse effect - termination of consultation.*** Fort Belvoir, SHPO, or the Council determine that further consultation will not be productive and terminates consultation by notifying all consulting parties in writing and specifying reasons for termination. Select 10(a), 10(b), or 10(c).
- 10(a). If Fort Belvoir terminates consultation, Fort Belvoir requests Council comment pursuant to 36 CFR 800.7(c) and notifies all consulting parties of request. Go to 11.
- 10(b). If SHPO terminates consultation, Fort Belvoir and the Council may execute a MOA. Fort Belvoir may then proceed with undertaking according to any stipulations in the MOA.
- 10(c). If the Council terminates consultation, the Council notifies Fort Belvoir, Federal Preservation Officer (FPO), and consulting parties and provides comments to FPO under 36 CFR 800.7(c). Go to 11.
11. ***Comments by the Council.*** The Council has 45 days after receipt of request to provide comments. The Council will allow an opportunity for Fort Belvoir, consulting parties, and general public to provide their views. The Council will provide its comments to head of agency with copies to Fort Belvoir, FPO, and all consulting parties. Select 11(a) or 11(b).
- 11(a). The head of agency takes into account the Council comments and Fort Belvoir implements the Council comments. Project may proceed.
- 11(b). The head of agency takes into account the Council comments and Fort Belvoir does not implement the Council comments. The head of the agency shall document the final decision in accordance with 36 CFR 800.7(4). All consulting parties are notified of decision. Project may proceed.

### Proceed

Once a signed MOA or Council comment has been received, Fort Belvoir can, subject to the terms of any agreement that has been reached, proceed. This is the end of the Section 106 compliance process. All documentation and correspondence regarding the process should be kept on file in CRM office.

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## STANDARD OPERATING PROCEDURE 2: ASSESSING EFFECTS ON HISTORIC PROPERTIES

The Section 106 review process requires Fort Belvoir to assess the effects of undertakings on historic properties. An “undertaking” is defined as any project, activity, or program that potentially results in changes to the character or use of a National Register eligible or listed historic property located in the Area of Potential Effects (Section 800.2[o]). For Fort Belvoir managers to assess effect, they must be able to determine what constitutes an effect on an historic property, and then reach a formal decision of effect in consultation with the SHPO. Therefore, the Cultural Resources Manager (CRM) should be informed of any actions that may affect cultural resources at Fort Belvoir prior to initiating work.

Several National Register eligible or listed historic properties are located on or immediately adjacent to Fort Belvoir. One archeological site, the Belvoir Manor Ruins and Fairfax Grave Site (44FX4), is listed in the National Register of Historic Places. Table 5 in Chapter II identifies other archeological sites at Fort Belvoir that have been assessed as eligible for listing in the National Register. Architectural properties currently identified as National Register-eligible include: the Fort Belvoir Historic District; the U.S. Army Package (Nuclear) Power Reactor Multiple Property; and three individually significant properties (Woodlawn Friends Meeting House, Camp A.A. Humphreys Pump Station and Filter Building, and the Thermo-Con House). Table 6 in Chapter II summarizes the current inventory of architectural resources at Fort Belvoir.

### Criteria of Effect

According to Federal Regulation 36 CFR 800.9, undertakings can be determined to have *no effect*, an *adverse effect*, or *no adverse effect* upon historic properties. Fort Belvoir must first determine when an effect occurs by applying the **Criteria of Effect** to an undertaking. The process of determining effect should be carried out in consultation with the SHPO.

Advisory Council regulations define "Effect" in two parts: (1) the **Criteria of Effect** (800.9[a]) determine whether there will be an effect; and (2) the **Criteria of Adverse Effect** (800.9[b]) determine whether the effect is harmful (ACHP 1995:II-51).

Effect/No Effect. An undertaking is determined to have **no effect** when no historic properties are determined to be affected directly or indirectly by the undertaking. If an undertaking is determined to have no effect on a historic property, the appropriate documentation should be made available to the SHPO and to interested persons who have made their concerns known to the Agency Official (36 CFR 880.5[b]). Unless the SHPO objects within 15 days of receiving such notice, no further steps in Section 106 are required (See Standard Operating Procedure 1).

A proposed undertaking is determined to have an **effect** if it: (a) alters the characteristics of a historic property that qualify it for the National Register; or (b) alters features of a historic property's location, setting, or use that contribute to its significance. Simply stated, any action that results in changes to specific features of an historic property is considered as an effect. It is essential, therefore, to identify those characteristics that make a property significant in assessing effects.

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Adverse Effect. If it is determined that a proposed project will have an effect on a historic property, the project next must be assessed to determine whether it will result in an **adverse effect**. The base official should apply the **Criteria of Adverse Effect** in making this determination. These criteria stipulate that an effect will be adverse if an undertaking:

- causes physical destruction, damage, or alteration of all or part of the affected historic property;
- isolates the historic property from, or alters the character of, the property's setting, when that setting contributes to the property's qualification for the National Register;
- introduces visual, audible, or atmospheric elements that are out of character with the historic property, or that alter its setting;
- results in neglect of a property that results in the deterioration or destruction of that property; and
- results in the transfer, lease, or sale of the property.

After these criteria have been applied, Fort Belvoir must make a formal determination as to whether the project will have **no adverse effect** or an **adverse effect**, again in consultation with the SHPO, at the discretion of Fort Belvoir.

Mitigation of adverse effect. Fort Belvoir and the SHPO may agree upon measures to avoid the adverse effect. If an undertaking is determined to have an adverse effect upon a historic property, action may be taken to:

- revise the specifications of the project that will impact the resource; or
- mitigate the adverse effects of the project upon the resource so that the essential historic value of the property is preserved, even though the property itself may be impacted.

Exceptions. There are exceptions to the above Criteria of Adverse Effect. For regulatory purposes, an undertaking that normally would be found to have an adverse effect may be considered to have no adverse effect when:

- the affected historic property is of value only for its potential contribution to archeological, historical, or architectural research, **and** this value can be preserved by conducting research on the property, in accordance with applicable professional standards and guidelines;
- the undertaking is limited to the rehabilitation of buildings and structures, **and** is conducted in a manner that preserves the historical and architectural value of the affected historic property through compliance with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*; or

- 
- the undertaking is limited to the transfer, lease, or sale of an historic property, **and** adequate restrictions or conditions are included to ensure preservation of the property's significant historic features (36 CFR 800.9).

## Summary of Procedure

1. Determine if historic properties are present.

Consult Chapter II, *Cultural Resources Identification and Evaluation*, for current cultural resources inventory. Actions will have no effect when no historic properties are present.

2. Determine nature of proposed action or repair.

When any doubt exists about the effects of a proposed action on cultural resources, action should be submitted to CRM for internal review.

3. Notify CRM of proposed action or repair.

CRM is responsible for determining what action is required under Section 106 of the NHPA.

4. CRM will initiate Section 106 consultation as required.

All Section 106 consultation required for historic properties located at Fort Belvoir will be initiated and conducted by the Cultural Resources Manager (CRM).



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## STANDARD OPERATING PROCEDURE 3: PUBLIC PARTICIPATION DURING SECTION 106 CONSULTATION

### Identification of Resources

In accordance with Section 470h-2 of the National Historic Preservation Act, Fort Belvoir has established a preservation program for the identification, evaluation, protection, and nomination to the National Register of its historic properties. To that end, Fort Belvoir has conducted numerous studies of its historic properties, including surveys to identify archeological sites and historic buildings; evaluation studies to determine the eligibility of sites and buildings for listing in the National Register; and preparation of National Register nominations for specific archeological properties, individual historic buildings, and historic districts.

Fort Belvoir's commitment to the stewardship of its historic properties includes compliance with 36 CFR Part 800.2(c), which requires the inclusion of consulting parties in the NHPA Section 106 process. The procedure set forward here outlines the procedure for maintaining continuing public participation in ongoing identification and evaluation efforts.

### Procedure for Public Participation

Fort Belvoir will distribute the final reports from general studies already conducted at the installation to the interested parties defined below:

- Adjacent National Register listed and eligible properties, including Woodlawn Plantation, Mount Vernon, Pohick Church, Gunston Hall, and *the Woodlawn Friends Meeting*;
- The Fairfax County *Architectural* Review Board; and
- The office of the Fairfax County Supervisor for the Mount Vernon District.

For future studies conducted at the installation, Fort Belvoir will:

- Distribute surveys that identify and assess the National Register eligibility of buildings (i.e. HABS and regular interval surveys conducted on Buildings 45-50 year old) to interested parties for their review and comment.
- Furnish to interested parties copies of Fort Belvoir's SHPO consultation correspondence as a means of notifying such parties of undertakings on the installation and to serve as an invitation to participate in the consultation.

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- At the request of interested parties, circulate correspondence between the State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), and Fort Belvoir on specific undertakings, including cases where these regulatory bodies have determined that Fort Belvoir's undertaking will have an adverse effect on historic properties.

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## **STANDARD OPERATING PROCEDURE 4: ARCHEOLOGICAL RESOURCE PROTECTION ACT (ARPA) COMPLIANCE**

ARPA requires that permits be issued prior to any excavating or removing archeological resources on Federal property or on property under Federal control. Issuance of a permit is not considered an undertaking and does not by itself require Section 106 review; however, acquisition of a permit also does not fulfill the requirements of Section 106 review.

Upon receipt of an application for a permit to excavate or remove an archeological resource, the CRM shall ensure that:

- the applicant is qualified to carry out the permitted activity;
- the activity is undertaken for the purpose of furthering archeological knowledge in the public interest and for the purpose of Section 110 and 106 compliance;
- the archeological resources that are excavated or removed from public lands will remain the property of the United States, and such resources and copies of associated archeological records and data will be curated in a repository that meets the standards established by 36 CFR 79; and,
- the activity pursuant to the permit is consistent with any management plan applicable to the public lands concerned.

Further details on the terms and conditions of the permit are spelled out in ARPA.

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## **STANDARD OPERATING PROCEDURE 5: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE**

Under NEPA, Federal agencies are responsible for considering the effect their actions will have on the environment, including cultural resources. The intention of NEPA regarding cultural resources is similar to NHPA, but Federal agencies must remember that compliance with one statute does not constitute compliance with the other. Agencies may, however, coordinate studies and documents to be completed in accordance with both Section 106 and NEPA compliance. Coordination of Section 106 compliance and NEPA can be accomplished by:

- Identifying and evaluating cultural resources and determining if a project has a potential effect on them while preparing NEPA documents. Consult Cultural Resources Manager (CRM) for determination of effect.
- The CRM determining the effect of the project and deciding if Section 106 review is necessary.
- Using the draft environmental impact statement (EIS) or environmental assessment (EA) as the basis for NEPA consultation and/or Section 106 review.
- Including the results of any consultation, an MOA, or ACHP comments in the final NEPA report.

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## **STANDARD OPERATING PROCEDURE 6: NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT (NAGPRA) COMPLIANCE**

This law, enacted in 1990, governs the repatriation and protection of Native American (American Indian, Inuit, and Hawaiian native) remains, associated and unassociated funerary objects, sacred objects, and objects of "cultural patrimony" on lands controlled or owned by the United States. The following sections present general DoD principles underlying the Native American consultation process, as well as procedures to be followed with regard to existing collections, intentional excavations, and inadvertent discoveries.

### **General Principles for Native American Consultations**

Native Americans often have strong religious and cultural ties to natural areas. Where applicable, DoD must consider these interests in land management decision making through consultation to identify and protect Native American cultural resources. DoD shall carry out consultations with Native American tribal governments in a manner that respects the sovereign status of each such federally recognized tribe. DoD shall consult to the greatest extent practicable and to the extent permitted by law prior to taking actions that affect the protected interests of Federally recognized tribal governments. Consultation shall be conducted with sensitivity to cultural values, socio-economic factors, and the administrative structure of the native group (DODI 4715.3 1996).

The following are the goals of the consultation process:

- Increase DoD awareness of the requirements of Native American cultures and religions, while increasing Native American awareness of DoD mission requirements.
- Increase Native American participation, as appropriate, in consultations on DoD actions and decisions that affect issues of significance to Native Americans.
- Educate DoD personnel about relevant policies and laws on Native Americans.
- Provide access by Native Americans to sacred and religious sites on DoD lands.
- Protect Native American cultural and historical resources on DoD lands or on non-DoD lands used by the Department of Defense (DODI 4715.3 1996).

At this time, no Federally recognized Native American tribes are located in Virginia. There are, however, several organized tribes recognized by the Commonwealth of Virginia, including the Upper Mattaponi, United Rappahannock, Chickahominy and East Branch Chickahominy, Nansemond, and Monacan. The state-wide organization that represents both organized tribes and

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unorganized Native Americans is the Virginia Council on Indians, 622 9th St. Office Building, Richmond, VA 23219.

## **Existing Collections**

NAGPRA requires Federal agencies and Federally-funded museums to identify the cultural affiliation of human remains and certain cultural items in their possession or control and to notify the Indian tribes, including Alaska Native regional and village corporations, Native Hawaiian organizations, and/or closest lineal descendants who are likely to be culturally affiliated with the human remains and cultural items. Furthermore, it calls for these remains and cultural items to be made available for return to the respective Native groups or closest lineal descendants, if they so request. The summary, inventory, and repatriation of human remains and cultural items defined in NAGPRA shall occur in accordance with NAGPRA (43 CFR Parts 10.5-10.7).

Currently, the collections resulting from archeological investigations conducted at Fort Belvoir contain no identified tribal human remains, funerary objects, sacred objects, or objects of cultural patrimony, according to a 1996 assessment by the US Army Corps of Engineers, St. Louis District.<sup>26</sup> Future projects, however, should consider the need for NAGPRA compliance in case of inadvertent discoveries of Native American artifacts. If future investigations reveal the possibility of Native American sites being discovered, Fort Belvoir is encouraged to prepare a mitigation plan in advance.

## **Intentional Excavations and Inadvertent Discoveries**

Consultation with Federally recognized Indian tribes or other Native American organizations is required by NAGPRA when human remains or other cultural items (defined in 25 U.S.C. 3001), or when a site of religious or cultural importance is found during either intentional excavations or by inadvertent discovery on DoD property. To the extent possible, the installation should consult with the tribe(s) early in the planning process (DODI 4715.3 1996). Consultation is undertaken to determine the cultural affiliation of human remains and specific cultural items and (2) to determine custody (or disposition) of recovered items. In cases of intentional excavation or inadvertent discovery of human remains and cultural items on federal lands, the procedures set out in 43 CFR Part 10.3(c-d) shall be followed. Figure 18 presents a diagram of the NAGPRA process.

### Intentional Excavations

- Any planned excavations will be coordinated with the Cultural Resources Manager (CRM).
- Fort Belvoir will take reasonable steps to determine whether a planned activity may result in the excavation of human remains, funerary objects, sacred objects, or objects of cultural patrimony from DoD lands. **Refer to ICRMP, Inventory of Archeological Resources (Chapter II) and/or conduct Phase I archeological investigations.**

## Native American Graves Protection and Repatriation Act

### INTENTIONAL EXCAVATIONS

#### FIRST NOTIFICATION

1. Notification must be made prior to the issuance of an ARPA permit when it is reasonably believed a planned activity may result in the excavation of Native American human remains or cultural items (43 CFR 10.3(a)); notification is required whether or not an ARPA permit is needed.
2. Notify in writing the appropriate Indian tribal officials of the proposed excavations, and propose a time and place for consultation meetings.
3. Follow written notification with telephone call if no response is received within 15 days.

#### SECOND NOTIFICATION

Second notification (in writing) is required once human remains and cultural items are recovered.

#### CONSULTATION

Consultation should address manner and effects of proposed excavations and the proposed treatment and disposition of recovered human remains and cultural items.

#### A WRITTEN PLAN OF ACTION

A written plan of action must be completed and its provisions executed.

### INADVERTENT DISCOVERIES

#### CEASE ACTIVITY

All activity at site must stop and reasonable steps to secure area must be taken.

#### NOTIFICATION

Discoverer must notify Installation Commander (for military lands) or or Indian official (for tribal lands) immediately, both verbally and in writing

#### COMMANDER'S ACTIONS

1. Immediately secure and protect the discovery.
2. Immediately certify receipt of notification.
3. Notify appropriate Federally-recognized tribes no later than 3 days after certification.

#### CONSULTATION

Commander should consult with interested parties to discuss disposition of remains and mitigation measures.

#### RESUME ACTIVITY

Activity may be resumed 30 days after certification of notification or sooner if a binding agreement is reached.

Figure 18. Schematic diagram of the NAGPRA consultation process

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- If **identified** remains or artifacts are to be excavated intentionally, Fort Belvoir should proceed in compliance with applicable ARPA, NHPA and NAGPRA regulations.
  - Prior to issuing any approvals or permits for activities, Fort Belvoir must notify in writing the tribe(s) that are likely to be culturally affiliated with artifacts etc (43 CFR 10.3[a]). Notice must be in writing and describe the planned activity, its general location, and the basis upon which it was determined that human remains or objects may be excavated. The notice must also propose a time and place for meetings or consultations to consider the proposed activity, and Fort Belvoir's treatment and disposition of any remains or objects. Written notification should be followed by telephone contact if there is no response within 15 days.
  - Notify the Installation Commander in writing of planned excavation and consultation.
  - Consultation should address manner and effects of proposed excavations, and the proposed treatment and disposition of recovered human remains and cultural items.
  - Following consultation, Fort Belvoir must complete a written plan of action and execute its provisions.

#### Inadvertent Discoveries

- Immediately stop any excavations that discover **ANY** human remains and make reasonable efforts to protect the burials and site.
  - Contact the installation CRM and the Police immediately following the discovery.
  - Contact the Department of the Interior's Departmental Consulting Archeologist (DCA) (Archeology Assistance Division, National Park Service, Washington DC 20013-7127 [(202) 343-4101]), and advise of the nature of the discovery. If known, provide as much information as possible concerning the cultural resource, such as resource type, date, location, and size, and any information as to its eligibility. The DCA retains the option of notifying and consulting with the ACHP and VDHR, who may require an on-site examination of the affected remains. The DCA will determine the significance and origin of the remains and what mitigation measures to take.
  - If Fort Belvoir has reason to know that it has discovered Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony, Fort Belvoir must provide immediate telephone notification of the discovery, **with written confirmation**,
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to the Departmental Consulting Archeologist (DCA), and appropriate DoD contacts.

- In the event that Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered, the installation should:
  - 1) Immediately secure and protect the discovered site by providing appropriate stabilization or covering.
  - 2) Immediately certify receipt of notification.
  - 3) Notify by telephone **with written confirmation** the appropriate Federally-recognized tribes **no later than 3 days after certification**. This notification must include pertinent information as to kinds of human remains, funerary objects, sacred objects, or objects of cultural patrimony, their condition and the circumstances of their discovery.
- The Commander should consult with interested parties to discuss disposition of remains and mitigation measures. Consultation is required for the inadvertent discovery of human remain, funerary objects, sacred objects, or objects of cultural patrimony discovered on federal or tribal lands (43 CFR Part 10.4(a)).
- Resume activity. Activity may be resumed 30 days after certification of notification, or sooner if a binding agreement is reached.

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## **STANDARD OPERATING PROCEDURE 7: AMERICAN INDIAN RELIGIOUS FREEDOM ACT (AIRFA) COMPLIANCE**

AIRFA promotes coordination with Native American religious practitioners regarding effects of Federal undertakings upon their religious practices. Undertakings that alter or affect flora and fauna, viewsheds, artifacts, and sites that may be important to Native Americans may be covered under this legislation. For more information, contact the Army Federal Preservation Officer, or AEC.

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## **STANDARD OPERATING PROCEDURE 8: EMERGENCY PROCEDURES FOR UNEXPECTED ARCHEOLOGICAL DISCOVERIES**

Archeological or historical sites occasionally are discovered during construction projects, regardless of whether or not the project area has been subjected to a comprehensive cultural resources survey and inventory. When review of a proposed undertaking suggests that cultural resources are likely to be discovered during the implementation of the undertaking, Fort Belvoir should develop a plan for the treatment of such properties and include this plan in any documentation submitted to the SHPO as part of the effort to assess the effects of the undertaking (36 CFR 800.11[a]).

Like other agencies, Fort Belvoir is not required to stop work on an undertaking in the case of unexpected discoveries. However, the Cultural Resources Manager (CRM) should be informed if prehistoric and historic archeological sites are discovered during construction projects in accordance with DA PAM 200-4, Section 2-4.f(2). The CRM should make reasonable efforts to avoid or minimize damage to the property until it has been assessed (36 CFR 800.11[b][3]).

### **Procedure**

If significant archeological resources, such as intact archeological features, human remains, etc., are discovered, the following steps should be taken immediately:

- Initially, Fort Belvoir must stop work and make reasonable efforts to protect the artifacts and the site.
- The installation CRM should be contacted immediately following the discovery.

A number of options may then be considered.

### **Option 1**

The installation CRM may:

- Contact the Department of the Interior's Departmental Consulting Archeologist (DCA) (Archeology Assistance Division, National Park Service, Washington D.C. 20013-7127 [(202) 343-4101]).
- Advise the DCA of nature of the discovery. If known, provide as much information about the archeological resource, such as resource type, date, location, size, and any information on its eligibility.
- The DCA may notify and consult with the ACHP and SHPO, who may require an on-site examination of the affected property. The

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DCA will determine the significance of the resources and suggest appropriate mitigation measures.

- Fort Belvoir complies with provisions governing discoveries in 36 CFR 800.

### Option 2

If the archeological discovery is eligible for the National Register, the CRM should:

- immediately prepare a mitigation plan. This plan should be sent to the SHPO and the ACHP.
- The ACHP must respond with preliminary comments within 48 hours; final comments are due within 30 days after the special request is made.

Option 2 is the most time-efficient approach because, technically, the construction project does not have to be halted. However, reasonable attempts should be taken to avoid further destruction to the resource until a formal data recovery mitigation plan can be executed.

### Option 3

Option 3 involves the Section 106 compliance process. This option is not recommended in the case of unexpected discoveries, since it can be a time-consuming procedure. If this option is chosen, thorough and complete documentation of the proposed impact and a subsequent mitigation plan must be completed to ensure the technical adequacy required by the SHPO or ACHP.

## **Discovery of Human Remains**

Discovery of human remains, of whatever nature, is a serious archeological problem. In Virginia, archeological investigation of human remains of any sort cannot be authorized without the issuance of a permit from the Virginia Department of Historic Resources. Violation of this portion of the Virginia State Code is a felony offense.

If the discovered remains are identified as Native American in origin, then the remains and associated cultural items shall be managed and repatriated to culturally affiliated or lineally descended Native American organizations in accordance with 25 U.S.C. 3001 and 43 CFR 10. At this point in time, Fort Belvoir as an installation does not possess or control Native American collections or cultural items, Native American remains, or Native American sacred sites or traditional cultural properties (US Army Corps of Engineers St. Louis District 1997). The installation currently is not associated with a Federally-recognized Native American tribe, and no tribal lands are recognized within Fort Belvoir's boundaries.

If any human remains or associated funerary objects are unexpectedly discovered at Fort Belvoir, the following steps should be undertaken:

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- **Stop work immediately.**
  - Notify installation Commander.
  - Contact the CRM.

If the remains are determined to be Native American in origin, Fort Belvoir then will be subject to compliance with NAGPRA (Standard Operating Procedure 6), specifically Section 39d "Inadvertent Discovery of Native American Remains and Objects."

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## **STANDARD OPERATING PROCEDURE 9: CURATION OF ARCHEOLOGICAL COLLECTIONS**

If archeological collections result either from unexpected discoveries or from authorized archeological investigations, Fort Belvoir must make efforts to ensure stable long-term storage of the collection. Archeological collections include the artifacts recovered from archeological sites, the documentary records pertaining to the excavations, and the final report. These records may include photographs, field data records and drawings, maps, and other documentation generated during the conduct of the project. Artifacts recovered from future investigations can either be stored in a secure fire-proof facility on the installation or transferred to an outside curation repository that meets federal standards stipulated in 36 CFR 79, *The Curation of Federally-Owned and Administered Archeological Collections*.

The initial processing of material remains (including appropriate cleaning, sorting, labeling, cataloging, stabilizing, and packaging) should be completed by personnel meeting professional qualifications established in 36 CFR 61. Additional rules and regulations are outlined in 36 CFR 79, *The Curation of Federally-Owned and Administered Archeological Collections*.

Fort Belvoir currently maintains the bulk of its archeological collections with the Fairfax County Park Authority's County Archeological Services. This arrangement first was authorized in 1985 by the Center for Military History, and documented in a letter to the Director, Army Environmental Command, and to Fort Belvoir. However, discussions underway at the present time may require transfer of these collections to a central repository to be identified by the Army Environmental Command.

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## STANDARD OPERATING PROCEDURE 10: EMERGENCY PROCEDURES FOR ARCHITECTURAL RESOURCES

This procedure should be initiated in the event of emergencies that affect historic properties at or immediately adjacent to Fort Belvoir. Architectural resources determined eligible for inclusion in the National Register include: the Fort Belvoir Historic District, the U.S. Army Package (Nuclear) Power Reactor Multiple Property, and three individually significant properties (Woodlawn Friends Meeting House, the Camp A. .A. Humphreys Pump Station and Filter Building, and the Thermo-Con House). Chapter II, Table 6, contains a complete current inventory of National Register-eligible properties at Fort Belvoir.

### Procedure

- Emergency procedures will be initiated as required by the situation. Emergencies include fire, flood, vandalism, and acts of nature, such as falling trees. Appropriate emergency personnel, including fire and police, should be contacted.
- The Cultural Resources Manager (CRM) should be informed of emergency as soon as possible.
- The CRM will review emergency stabilization measures undertaken to protect the historic property and to preserve its historic fabric and features. In general, emergency stabilization measures include *short-term and reversible* repairs that do not harm historic fabric or features.
- The CRM will inform the SHPO of the nature of emergency affecting historic properties and of the stabilization measures that have been implemented.
- Once the building has been stabilized, the CRM will initiate permanent repairs to be carried out in accordance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*.
- The CRM will coordinate necessary review of the proposed permanent repairs with SHPO, following the Section 106 process.

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## STANDARD OPERATING PROCEDURE 11: ECONOMIC ANALYSIS FOR DEMOLITION OF HISTORIC BUILDINGS

The Cultural Resources Manager (CRM) will request an economic analysis of all National Register-eligible properties that are being considered for demolition and replacement in accordance with DODI 4715.3, *Environmental Conservation Program*. NHPA requires that historic properties be considered for re-use to the maximum extent feasible before disposal. The decision to re-use, replace, or demolish a facility should be based on an economic analysis that includes an evaluation of life-cycle maintenance costs, utility costs, replacement costs, and other pertinent factors (DODI 4715.3 1996). Consult Chapter II, Table 6, for a current inventory of National Register-eligible properties at Fort Belvoir.

If the economic analysis demonstrates that the revitalization cost of a historic property exceeds 70 per cent of its replacement cost, replacement construction may be used. However, the 70 per cent value may be exceeded if the building merits special attention due to its architectural or historical importance (DODI 4715.3 1996).

### Procedure

- The CRM will request the services of a qualified professional to undertake an economic analysis of historic buildings and structures that are being considered for demolition and replacement.
- An assessment of new construction should evaluate life-cycle maintenance cost and replacement cost as alternatives for consideration by the decision maker. Replacement cost shall not be based on replacement in kind, but shall be based on a design that is architecturally compatible with the historic property.

Federal Agencies are required to make maximum reuse of historic buildings before disposal, new construction, or leasing (Section 470 et seq. of 16 U.S.C.). If the building to be disposed of is historic, potential reuses of the building must be considered prior to making a decision to dispose of it (DODI 4715.3 1996).



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